Technical Guidance for Valid Reporting of Custodian ID using CMS Certification Numbers in QRDA Category I Files for Hospital Quality Reporting Programs

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The Centers for Medicare & Medicaid Services (CMS) has issued technical guidance for vendors and data submitters on how to electronically submit hospital custodian ID using CMS Certification Numbers (CCNs).

Reporting CCN is required in Quality Reporting Document Architecture (QRDA) Category I files for Hospital Quality Reporting (HQR) programs.

This guidance affects:

- Electronic Clinical Quality Measure submissions for calendar year 2017
- QRDA Category I files for the Hospital Inpatient Quality Reporting Program and the Medicare Electronic Health Record Incentive Program for Eligible Hospitals and Critical Access Hospitals
The Issue:

- CCN is represented by using the custodian/assignedCustodian/representedCustodianOrganization/id element in the QRDA Category I document header specified by the CMS template called the “QRDA Category I Report”
- The schematron rules published for the 2017 CMS QRDA I Implementation Guide erroneously enforces the 6 to 10 characters length check on all hospital identifiers
- If identifiers other than CCN with values shorter than 6 characters or longer than 10 characters are provided, an error will be triggered
The Resolution:

- Submitters are advised to actively ensure that only a CCN number and no other identifiers are submitted for custodian/assignedCustodian/representedCustodianOrganization/id
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Example xml snippet that validates successfully for the 2017 reporting period for QRDA I test submission to HQR:

```xml
<custodian>
  <assignedCustodian>
    <representedCustodianOrganization>
      <!-- @extension attribute contains the submitter's CCN. @nullFlavor is not allowed. -->
      <id root="2.16.840.1.113883.4.336" extension="800890"/>
    </representedCustodianOrganization>
    <name>Good Health Hospital</name>
    <telecom value="tel:(555)555-1212" use="WP"/>
    <addr use="WP">
      <streetAddressLine>17 Daws Rd.</streetAddressLine>
      <city>Blue Bell</city>
      <state>MA</state>
      <postalCode>02368</postalCode>
      <country>US</country>
    </addr>
  </assignedCustodian>
</custodian>
```

Example xml snippet that results in error:

```xml
<custodian>
  <assignedCustodian>
    <representedCustodianOrganization>
      <!-- @extension attribute contains the submitter's CCN. @nullFlavor is not allowed. -->
      <id root="2.16.840.1.113883.4.336" extension="800890"/>
      <!-- TIN identifier -->
      <id root="2.16.840.1.113883.4.336" extension="12345678901"/>
    </representedCustodianOrganization>
    <name>Good Health Hospital</name>
    <telecom value="tel:(555)555-1212" use="WP"/>
    <addr use="WP">
      <streetAddressLine>17 Daws Rd.</streetAddressLine>
      <city>Blue Bell</city>
      <state>MA</state>
      <postalCode>02368</postalCode>
      <country>US</country>
    </addr>
  </assignedCustodian>
</custodian>
```
Resources

» Current and past implementation guides - eCQI Resource Center QRDA Space

» For questions related to this guidance, the QRDA Implementation Guides or Schematrons, visit the ONC QRDA JIRA Issue Tracker

» For questions related to Quality Payment Program/MIPS submissions, visit the Quality Payment Program website or call 1-866-288-8292